

IN THE CIRCUIT COURT OF  
THE 17<sup>TH</sup> JUDICIAL CIRCUIT IN  
AND FOR BROWARD COUNTY  
FLORIDA

POMPANO SENIOR SQUADRON  
FLYING CLUB, INC., a Florida  
corporation,

CASE NO.: CACE 20-005993 (08)

Plaintiff,

v

CARL KENNEDY, individually,

Defendant.

**PLAINTIFF'S MOTION TO COMPEL**

Plaintiff, POMPANO SENIOR SQUADRON FLYING CLUB, INC. (Plaintiff "Club"), by and through its undersigned counsel, pursuant to Rule 1.350, Fla. R. Civ. P. files this Motion to Compel against Defendant CARL KENNEDY (Defendant "Kennedy") and says:

1. Plaintiff Club propounded a Request to Produce to Defendant Kennedy on or about July 27, 2020. Pursuant to Rule 1.350, Fla. R. Civ. P., Defendant Kennedy's responses to the Request to Produce were due on or about August 28, 2020.
2. Defendant Kennedy filed a Motion for Extension of Time as to the Request to Produce until after September 1, 2020. The time to respond, even based upon Defendant Kennedy's Motion for Extension of Time has expired.

WHEREFORE, Plaintiff Club moves this Honorable Court for an Order compelling Defendant Kennedy's response, without objections, to Plaintiff Club's Request to Produce, an award of Court costs and attorney fees, and any further relief that this Court deems just and equitable.

